

Dear Mr. Deegan,

Thank you for your e-mail regarding this claim. I had submitted a letter to Mr. Maestas approximately two months ago and had not heard anything from anyone. I don't know when he got our demand to your office, however, I appreciate you communicating with me as I was getting ready to file a lawsuit against his firm this week. With reference to getting you all of the requested documents, be advised that I will be obtaining them and will also submit our demand. However, there is no reason for you not to be able to obtain the requested information from your insured, Mr. Maestas as he has the original documents in his office and after all, he is your insured and has a responsibility to cooperate with your company in the investigation and preparation of this case. What I see is you requiring my client to invest additional time and money to do what your insured is required to do. However, if your insured will not cooperate with you, I will be more than glad to provide you with the requested documents. Mr. Maestas is not the most cooperative person I have dealt with. I look forward to your response.

Rudy Martin
Attorney at Law
P.O. Box 2668
Española, New Mexico 87532
(505) 747-3799
Rmart1017@yahoo.com

From: Michael Deegan <michael.deegan@zurichna.com>
To: rmart1017@yahoo.com
Cc: alan@taoslegal.com
Sent: Wed, April 6, 2011 7:08:14 AM
Subject: Cristobal Montoya / Alan Maestas 9410337019

Mr. Martin,

This will acknowledge receipt of your claim against Alan Maestas Law Office, P.C. I am the Professional Liability Counsel for this matter; kindly direct all correspondence to my attention.

In order to investigate the matter, please provide me with a comprehensive letter describing the alleged facts and circumstances surrounding this claim. In addition, provide me with any and all documentation which you believe supports this claim. Finally, please provide me with a reasonable demand to consider for purposes of potential settlement of this matter, along with any documentation that supports your damages demand. Note that this request for a demand is not an admission of liability, but made in the normal course of investigating the claim.

If you have any questions, please contact me. Kindly include the above claim number on all forms of communication.

Michael J. Deegan
Claims Counsel - Zurich Professional Programs Claims
Zurich American Insurance Company
Professional Programs Claims
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*file
Cristobal Montoya*

DEFENDANT'S
EXHIBIT

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